

### REMARKS

Applicants appreciate the thorough examination of the present application as evidenced by the Office Action. Applicants submit that the present application is in form for allowance for at least the reasons discussed below.

The Office Action indicates that all the previous rejections under 35 U.S.C. §§ 102 and 103 have been overcome. Office Action, pp. 4-5. However, pending Claims 1-9 and 11-33 now stand rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. Office Action, p. 2. More particularly, the Office Action asserts that the present specification discloses that "both the protection/reaction-preventing layer and the dielectric layer are formed at about 600°C or less" and that this does not support claims directed to forming these layers at substantially the same temperature. Office Action, pp. 3-4.

Applicants respectfully disagree as the specification discloses processing the two layers at the same or substantially the same temperature. In particular, for the protection layer, the specification describes a plasma nitration process where the oven temperature is set at "about 600°C." Specification, p. 7, lines 28-29. CVD and ALS processes are also described where the oven temperature is set at "about 550°C." Specification, p. 8, lines 11-12, 27-28. For the dielectric layer, the specification describes a CVD process where the oven temperature is set at "about 600°C." Specification, p. 11, lines 5-6. Thus, embodiments where substantially the same temperature are used for both are disclosed and the written description requirement is satisfied for at least these reasons.

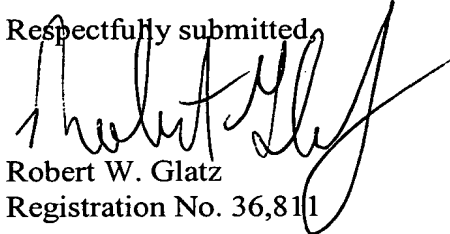
In addition, the specification has been amended above to delete the phrase "or less" in describing an atomic layer deposition process for the dielectric layer. Thus, processing at "about 600°C" is also described for this process. This change is fully supported by the original Korean priority application, which was incorporated by reference in the present application. A certified English translation of the priority document is submitted herewith. As seen at page 14, lines 4-5 of the translation, the phrase "or less" does not appear in the priority application.

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### CONCLUSION

Applicants respectfully submit that the written description rejection should be withdrawn for at least the reasons discussed above. Accordingly, Applicants respectfully request reconsideration of the rejections by the Examiner and allowance of all the pending claims and passing this application to issue.

Respectfully submitted,

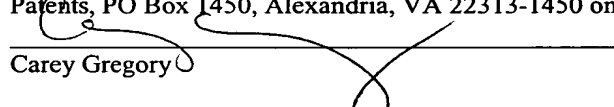


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